



October 2, 2019

VIA ECF

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Hon. Leda Dunn Wettre, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Erin Henderson v. New York Jets, LLC
Civil Action No. 2:17-cv-10110 (SDW) (LDW)

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Dear Judge Wettre:

On behalf of both parties, I am writing to provide an update on the discussions between the parties regarding plaintiff's expert witness, Michael Lombardi, and to jointly propose dates for completion of expert discovery. After conferring further to clarify Mr. Lombardi's opinion, defendant has determined to proceed to obtain an expert report in response to Mr. Lombardi's report and to take Mr. Lombardi's deposition after serving a responsive report. The parties jointly propose that defendant will serve its responsive expert reports by October 31, 2019 and that the parties will complete depositions of the four experts by December 16, 2019.

Respectfully submitted,

/s/Adam Saravay

Adam Saravay

cc: Larry Lavigne, Esq. (by ECF)

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